

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
NORTHERN DIVISION**

CNS INTERNATIONAL)	
MINISTRIES, INC.,)	
)	
Plaintiff,)	Case No. 2:21-cv-00065
)	
v.)	
)	
ROBERT KNODELL,)	
)	
Defendant.)	

JOINT PROPOSED AMENDED SCHEDULING PLAN

The parties, for good cause shown in their June 21, 2022, Joint Status Report, and in the April 26, 2022, Joint Motion to Stay Deadlines (Ct. Doc. 30), respectfully submit this Joint Proposed Amended Scheduling Plan for the Court's consideration.

This case was stayed in order to facilitate ongoing settlement discussions. Defendant had propounded written discovery to Plaintiff, but, due to the operation of the Court's April 27, 2022, stay order, Plaintiff has not yet responded. Plaintiff will respond to Defendant's First Set of Requests for Production of Documents Directed to Plaintiff and Defendant's First Set of Interrogatories Directed to Plaintiff on June 28, 2022.

No depositions have been scheduled or taken. The parties need additional time to complete discovery.

Due to the operation of the Court's April 27, 2022, stay order, the following deadlines in the December 3, 2021, Case Management Order (Ct. Doc. 15) are no longer viable: completion of discovery (see Ct. Doc. 15 at 2, I.3.e), filing discovery motions (see Ct. Doc. 15 at 2, I.3.f), and the dispositive motion deadlines in Section I.5 of the current Case Management Order (see Ct. Doc. 15 at 2). The parties propose a trial setting on or after July 26, 2023, based upon the need to extend discovery and other deadlines in the December 3, 2021, Case Management Order (Ct. Doc. 15).

PROPOSED AMENDED SCHEDULING PLAN

1. Plaintiff will respond to Defendant's motion for judgment on the pleadings (Ct. Doc. 26) on or before **July 28, 2022**.

2. The parties shall complete all discovery in this case no later than **October 6, 2022**.

3. Any discovery motions (motions to compel) shall be filed no later than **September 19, 2022**.

4. Any motions to dismiss, motions for summary judgment, and motions for judgment on the pleadings must be filed by **November 7, 2022**. For summary judgment motions, opposition briefs shall be filed by **December 7, 2022**, or within 30 days of the filing of the motion, whichever is earlier; and any reply brief may be filed by **December 21, 2022**, or within fourteen days of the filing of the opposition, whichever is earlier.

5. The parties propose a bench trial beginning on or after **July 26, 2023.**

WHEREFORE, based on the forgoing, the parties respectfully request that the Court enter an order amending the Case Management Order in accordance with the parties' proposed deadlines hereinabove.

Respectfully submitted,

ERIC S. SCHMITT

Attorney General

/s/ Emily A. Dodge

Emily A. Dodge, Mo Bar #53914

Assistant Attorney General

P.O. Box 899

Jefferson City, MO 65102-0899

Tel: (573) 751-7344

Fax: (573) 751-9456

Email: Emily.Dodge@ago.mo.gov

ATTORNEY FOR DEFENDANT

OTTSEN, LEGGAT AND BELZ, L.C.

/s/ Timothy Belz

Timothy Belz, Mo Bar #31808

112 South Hanley, Second Floor

St. Louis, Missouri 63105-3418

Phone: (314) 726-2800

Facsimile: (314) 863-3821

Email: tbelz@olblaw.com

ATTORNEY FOR PLAINTIFF